

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

United States of America, : Case No. 3:18-CR-00168-2

Plaintiff, : HON. JEFFREY J. HELMICK

vs. : **NOTICE OF REQUEST FOR**

Barbara Wilson, : **DISCOVERY**

Defendant. :

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the Defendant requests discovery and inspection with the right to copy or photograph, where appropriate, the following materials:

1. Pursuant to Rule 16(a)(1)(A), the substance of all oral statements made by Defendant.
2. Pursuant to Rule 16(a)(1)(B), all written or recorded statements of Defendant.
3. Pursuant to Rule 16(a)(1)(D), a copy of the Defendant's prior criminal record.
4. Pursuant to Rule 16(a)(1)(E), all documents, photographs, and other tangible objects, or copies of portions thereof that (i) is material to preparing the defense; (ii) the Government intends to use in its case in chief at trial; (iii) the item was obtained from or belongs to Defendant.

5. Pursuant to Rule 16(a)(1)(F), all reports of physical and mental examination and of any scientific test or experiment.
6. Pursuant to Rule 16(a)(1)(G), the name(s) of any expert witness and the requisite summary of testimony the Government intends to utilize as evidence in chief at trial.
7. All evidence favorable to the Defendant on the issues of guilt or punishment. In addition to the above request, Defendant respectfully requests the following additional items:
  - a. Pursuant to *Brady v. Maryland*, 373 U.S. 83 (1963), Defendant hereby requests that she be provided with any exculpatory material which exists in this case relating to guilt and/or punishment. Should there be a question with regard to whether certain information constitutes *Brady* material, the information should be presented to the Court for view in camera to determine whether it should be produced.
  - b. Pursuant to FED. R. CRIM. P. 26.2, Defendant request pretrial production of *Jencks* material. If pretrial *Jencks* material is produced by the Government, the Defendant is willing to reciprocate in kind.
  - c. Defendant requests notice of any evidence which the Government intends to introduce pursuant to Federal Rule of Evidence 404(b).
  - d. Pursuant to Rule 12(a)(4) of the Federal Rules of Criminal Procedure, Defendant hereby requests notice of which evidence the Government intends to use in its case-in-chief.

Respectfully submitted,

EASTMAN & SMITH LTD.

/s/ Adam S. Nightingale

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Attorney for Defendant Barbara Wilson

**PROOF OF SERVICE**

This is to certify that a copy of the foregoing has been filed electronically this 1<sup>st</sup> day of May, 2018. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system, and the parties may access this filing through the Court's system.

/s/ Adam S. Nightingale

Attorney for Defendant Barbara Wilson